

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GUADALUPE ARENAS VARGAS, et al.,	§	CIVIL ACTION NO. 4:09-CV-02521
Plaintiffs,	§	
	§	
v.	§	JUDGE KEITH P. ELLISON
	§	
KIEWIT LOUISIANA CO., et al.,	§	
Defendants.	§	JURY

**APPENDIX TO MEMORANDUM IN SUPPORT OF DEFENDANT’S
MOTION FOR PARTIAL SUMMARY JUDGMENT ON PLAINTIFFS’
WAGE CLAIMS**

NOW INTO COURT, through undersigned counsel, comes Defendant, Kiewit Engineering Company (“KECO” or “Defendant”), who submits this appendix to memorandum in support of its motion for partial summary judgment in favor of KECO and against the plaintiffs, Guadalupe Arenas Vargas, individually (“Wife” or “Vargas”) and as representative of the Estate of Martin Anastacio Reyes Osuna, deceased (“Estate”) and as next friend of Zaid Martin Reyes Arenas (“Child”); and, Sylvia Ozuna Garcia and Martin Reyes Adame, parents of the deceased Martin Anastacio Reyes Osuna (“Parents”) (collectively, “Plaintiffs”).

Respectfully Submitted,

LEBLANC BLAND P.L.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served upon all counsel of record either by hand delivery, facsimile or by placing the same in the United States mail, properly addressed and postage pre-paid, this 24th day of April, 2012.

BEAU E. LEBLANC

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1. *Rodriquez v. Kline*, 232 Cal. Rptr. 157 (Cal. Ct. App. 1986)
2. *Sanango v. 200 East 16th Street Housing Corp.*, 15 A.D.3d 36, 88 N.Y.S.2d 314 (N.Y.A.D. 1 Dept.2004)
3. *Rosa v. Partners in Progress, Inc.*, 152 N.H. 6 A.2d 994 (2005)

DEPOSITIONS:

4. Guadalupe Arenas Vargas